Exhibit 2

Lightfoot, Jewel M (CIV)

From: Cary McGehee <cmcgehee@pittlawpc.com>

Sent: Sunday, February 16, 2025 4:04 PM

To: Lightfoot, Jewel M (CIV); Patrick Lanciotti; Paul Napoli; Julie Hurwitz; deborah labelle
Cc: Corsentino Burtch, Katlyn C (CIV); Domingue II, Michelle T (CIV); Eagles, Daniel C. (CIV);

Gonzalez, Heidy (CIV); Rey, Eric A. (CIV); Cohen, Jason T. (CIV);

Michael.L.Williams@usdoj.gov; Walthall, Timothy (CIV); Glynn, J.Patrick (CIV); Falk,

Christina (CIV)

Subject: [EXTERNAL] RE: Response to motion to compel meeting

USA Counsel,

In addition to our dispute with the position taken by the DOJ during the meet and confer, the relief that plaintiffs requested included being able to depose Dr. Goodman in the areas that we were prevented from exploring during her deposition. Therefore, we request that you file a response to our motion.



Peace,

Cary S. McGehee (pronouns: she/her/hers) Founding Partner

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The arc of the moral universe is long, but bends towards justice"

Dr. Martin Luther King, Jr.

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